

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 22-CV-989

APPROXIMATELY 32133.63 TETHER (USDT)
CRYPTOCURRENCY FROM BINANCE
ACCOUNT NUMBER ENDING 8770,

Defendant.

MOTION BY UNITED STATES FOR EXTENSION OF TIME

The United States of America, by and through its attorneys, Gregory J. Haanstad, United States Attorney, and Bridget J. Schoenborn, Assistant United States Attorney, hereby respectfully requests a three-week extension of time until March 24, 2023, in which to file an amended complaint. In support of this request, undersigned counsel submits the following:

The United States has moved for default judgment in the above-captioned case. Pursuant to the Court's order dated January 30, 2023, the government has failed to allege how it traced fraud proceeds to the Binance account ending in 8770. The government has also not properly established a valuation for the defendant Tether cryptocurrency. The Court ordered that an amended complaint be filed on or before March 3, 2023.

The government requires additional time to prepare an amended complaint. First, undersigned counsel is out of the office on March 2 and 3, 2023. Second, in addition to the

amended complaint, the government will prepare and file a brief and a chart to support its theory of forfeiture.

For these reasons, the government respectfully requests a three-week extension of time until March 24, 2023, in which to file an amended complaint.

Respectfully submitted at Milwaukee, Wisconsin, this 27th day of February 2023.

By:

GREGORY J. HAANSTAD
United States Attorney

s/ Bridget J. Schoenborn
BRIDGET J. SCHOENBORN
Assistant United States Attorney
United States Attorney's Office
Wisconsin Bar No. 1053696
517 E. Wisconsin Ave. Room 530
Milwaukee, WI 53202
414/297-1700; Fax 414/297-1738
Bridget.Schoenborn@usdoj.gov